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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 DANITA DAILEY-ADAMS, individually,

12 Plaintiffs,

13 vs.

14 ALBERTSON'S LLC; DOES I through X;
15 inclusive; ROE BUSINESS ENTITIES I
through X, inclusive,

16 Defendants.

Case No. 2:17-cv-02602-GMN-GWF

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SECOND REQUEST)

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18 In accordance with Local Rules of Practice for the United States District Court for the
19 District of Nevada ("LR") 26-4, Defendant Albertson's LLC ("Defendant"), by and through its
20 counsel of record, BACKUS, CARRANZA & BURDEN, and Plaintiff Danita Dailey-Adams
21 ("Plaintiff"), by and through her counsel of record, BERTOLDO BAKER CARTER & SMITH, hereby
22 stipulate and agree to an extension of all remaining discovery deadlines by sixty (60) days. The
23 parties propose the following revised discovery plan:

24 **DISCOVERY COMPLETED TO DATE**

25 The parties conducted an Initial Disclosure Conference pursuant to LR 26-1 and Fed. R.

1 Civ. P. 26(f) on November 28, 2017. In December 2017, the parties served their initial
 2 disclosure of documents and the names of individuals with knowledge of the facts pertaining to
 3 the claims set forth in this matter pursuant to Fed. R. Civ. P. 26(a)(1). On February 28, 2018,
 4 Defendant propounded interrogatories and requests for production of documents upon Plaintiff.
 5 On March 29, 2018, Plaintiff responded to Defendant's written discovery requests. Plaintiff's
 6 deposition was taken on May 7, 2018. The parties have made their initial expert disclosures on
 7 July 25, 2018.

8 **DISCOVERY TO BE COMPLETED**

9 The parties intend to depose representatives of Defendant, other percipient witnesses,
 10 Plaintiff's medical providers and experts.

11 **REASONS FOR EXTENSION TO COMPETE DISCOVERY**

12 A mediation is scheduled for September 13, 2018. Thus, the parties seek a brief sixty-
 13 day extension of the remaining discover deadlines to seek successful resolution of this case. This
 14 request is made in good faith and not for the purpose of delay.

15 **PROPOSED NEW DISCOVERY DEADLINES**

16 **Deadline to Amend Pleadings/Add Parties:**

17 Currently: March 27, 2018
 18 Proposed: N/A

18 **Interim Status Report:**

19 Currently: July 25, 2018
 20 Proposed: N/A

21 **Initial Expert Disclosure Deadline:**

22 Currently: July 25, 2018
 23 Proposed: N/A

24 **Rebuttal Expert Disclosure Deadline:**

25 Currently: August 27, 2018
 Proposed: October 26, 2018

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Discovery Cutoff:

Currently: September 24, 2018
Proposed: November 23, 2018

Deadline to File Dispositive Motions:

Currently: October 23, 2018
Proposed: December 21, 2018

Pre-Trial Order Deadline:

Currently: November 22, 2018
Proposed: January 21, 2019

DATED: August 15, 2018

DATED: August 15, 2018

BACKUS, CARRANZA & BURDEN

BERTOLDO BAKER CARTER & SMITH

/s/ Jack P. Burden

/s/ Lawrence J. Smith

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ORDER

IT IS SO ORDERED.

DATED: this 16th day of August, 2018.



UNITED STATES MAGISTRATE JUDGE